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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JERRY MICHAEL FAMBRO,
15 Defendant.

Case No. 3:22-cr-00047-ART-CSD

**STIPULATION TO CONTINUE
SENTENCING HEARING
(FIRST REQUEST)**

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17 IT IS HEREBY STIPULATED AND AGREED by and through RENE L.
18 VALLADARES, Federal Public Defender and ALLIE WILSON, Assistant Federal Public
19 Defender, counsel for JERRY MICHAEL FAMBRO and JASON M. FRIERSON, United
20 States Attorney, and ANDREW KEENAN, Assistant United States Attorney, counsel for the
21 UNITED STATES OF AMERICA, that the Sentencing hearing set for November 29, 2022, at
22 1:00 PM, be vacated and continued to January 24, 2023, at 1:00 PM.
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1 The continuance is necessary for the following reasons:

2 1. This is a joint request by counsel for the Government and counsel for the
3 Defendant, Mr. Fambro.

4 2. The additional time requested by this Stipulation is reasonable pursuant to
5 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,
6 change any time limits prescribed in this rule.”

7 3. Both counsel request this additional time in order to allow adequate time to
8 research sentencing issues and to prepare for the sentencing hearing.

9 4. Mr. Fambro is detained and agrees to the continuance. Specifically, Mr. Fambro
10 was informed that the continuance will allow defense counsel to continue to gather documents
11 in support of the hearing and provide continuity of counsel.

12 5. This is the first request for continuance of the sentencing hearing.

13 DATED this 17th day of November, 2022.

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17 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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19 By /s/ Allie Wilson
ALLIE WILSON
20 Assistant Federal Public Defender
Counsel for JERRY FAMBRO

By /s Andrew Keenan
ANDREW KEENAN
21 Assistant United States Attorney
Counsel for the Government

ORDER

Based on the Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently set for November 29, 2022, at 1:00 PM, be vacated and continued to **January 24, 2023, at 1:00 P.M.**

DATED this 21st day of November, 2022.

A handwritten signature in black ink, appearing to read "Anne R. Traum", is written over a horizontal line.

Anne R. Traum
United States District Judge